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August 1, 2013

GIHAN PERERA, TREASURER FLORIDA FREEDOM PAC 8330 BISCAYNE BLVD, SUITE 1 MIAMI, FL 33138

Response Due Date 09/05/2013

**IDENTIFICATION NUMBER: C00521013** 

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 - 11/26/2012), RECEIVED 02/14/2013

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 3 item(s):

1. Your amended report discloses an increase in disbursements totaling \$251,552.45 on Lines 24 and 29 of the Detailed Summary Page from those disclosed on your original report.

The Commission notes the memo text attached to your report stating, "Please note that there is a difference between the disbursements and cash-on-hand totals disclosed on the summary pages of the original report and the amended report. Previous filings disclosed estimates for independent expenditures, and while best efforts were made to accurately report the estimates, this report reflects the actual amounts spent for these activities. Also, 48-Hour Notices were previously filed to disclose salary and food estimates related to canvassing activities. Therefore, the salaries and payments to Walgreens for food that are reported here as independent expenditures are not new independent expenditures, but rather represent a more detailed and accurate itemization of the following 48-Hour Notice that was previously filed: 10/18/12 (Amended 12/4/12) - filed with individual canvassers as the vendors, and Florida New Majority as vendor for food Finally, please note that we disclosed independent expenditures for canvasser salaries on 24 and 48-hour reports for the last few weeks of the month in total, but, in actuality the canvassers were paid on a weekly basis, which is accurately reflected in this report."

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Although the Commission may take further legal action concerning this matter, your clarification and any additional clarification you may have will be taken into consideration. 11 CFR §104.3

- 2. Schedule E of your report indicates that your committee may have failed to file and timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))
- **3.** Schedule E supporting Line 24 of your report discloses independent expenditures on behalf of "BARACK OBAMA," "BILL NELSON," "JOE GARCIA," and "VALDEZ VAL DEMINGS" which appear to have been publicly disseminated or distributed after the general election date. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR § 104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide **the original date of dissemination** for the independent expenditure(s) disclosed after the general election date.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will

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#### not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,

Sarah Juris

Campaign Finance Analyst Reports Analysis Division

Sarah guris

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Name of Payee	Date	Amount	Candidate	Election
Andre Broussard	10/19/2012	\$399.23	BARACK OBAMA	G2012
Anne Pierre	10/19/2012	\$320.74	BARACK OBAMA	G2012
Annie Rodriguez	10/19/2012	\$780.18	BARACK OBAMA	G2012
Oscar Balladares	10/19/2012	\$390.09	BARACK OBAMA	G2012
Brandon Llewellyn	10/19/2012	\$320.74	BARACK OBAMA	G2012
Darlene Marshall	10/19/2012	\$501.63	BARACK OBAMA	G2012
Marceline Fleurilus	10/19/2012	\$320.74	BARACK OBAMA	G2012
Gloria Clowney	10/19/2012	\$320.74	BARACK OBAMA	G2012
Maria Hays	10/19/2012	\$704.17	BARACK OBAMA	G2012
Jonathan Rodrigues	10/19/2012	\$83.91	BARACK OBAMA	G2012
Joseph Jay	10/19/2012	\$682.25	BARACK OBAMA	G2012
Jorge Lopez	10/19/2012	\$718.74	BARACK OBAMA	G2012
Marisol Marquez	10/19/2012	\$659.75	BARACK OBAMA	G2012
Marie Novoa	10/19/2012	\$249.87	BARACK OBAMA	G2012
Ophelia Somers	10/19/2012	\$329.86	BARACK OBAMA	G2012
Shakera Bailey	10/19/2012	\$659.75	BARACK OBAMA	G2012
Marva Smith	10/19/2012	\$360.28	BARACK OBAMA	G2012
Corey Willborn	10/19/2012	\$659.75	BARACK OBAMA	G2012
Tea Zubic	10/19/2012	\$641.48	BARACK OBAMA	G2012
Andre Broussard	10/26/2012	\$50.54	BARACK OBAMA	G2012
Anne Pierre	10/26/2012	\$80.19	BARACK OBAMA	G2012
Annie Rodriguez	10/26/2012	\$128.73	BARACK OBAMA	G2012
Beverly Armstrong	10/26/2012	\$50.23	BARACK OBAMA	G2012
Oscar Balladares	10/26/2012	\$128.73	BARACK OBAMA	G2012
Elena Barnabe	10/26/2012	\$20.11	BARACK OBAMA	G2012
Brandon Llewellyn	10/26/2012	\$40.61	BARACK OBAMA	G2012
Sumintra Carlisle	10/26/2012	\$42.92	BARACK OBAMA	G2012
Robert Constant	10/26/2012	\$42.40	BARACK OBAMA	G2012
Darlene Marshall	10/26/2012	\$82.77	BARACK OBAMA	G2012
Diane Duvercy	10/26/2012	\$141.18	BARACK OBAMA	G2012
Marceline Fleurilus	10/26/2012	\$80.19	BARACK OBAMA	G2012
Chrisna Forero	10/26/2012	\$14.01	BARACK OBAMA	G2012
Gloria Clowney	10/26/2012	\$40.61	BARACK OBAMA	G2012
Judit Gual	10/26/2012	\$23.56	BARACK OBAMA	G2012
Tristan Guzman	10/26/2012	\$13.21	BARACK OBAMA	G2012
Maria Hays	10/26/2012	\$116.19	BARACK OBAMA	G2012
Jonathan Rodrigues	10/26/2012	\$83.91	BARACK OBAMA	G2012

Name of Payee	Date	Amount	Candidate	Election
Joseph Jay	10/26/2012	\$112.57	BARACK OBAMA	G2012
Dennis Junior	10/26/2012	\$58.38	BARACK OBAMA	G2012
Jorge Lopez	10/26/2012	\$118.59	BARACK OBAMA	G2012
Marisol Marquez	10/26/2012	\$108.86	BARACK OBAMA	G2012
Brenda Narvaez	10/26/2012	\$20.93	BARACK OBAMA	G2012
Marie Novoa	10/26/2012	\$77.55	BARACK OBAMA	G2012
Ophelia Somers	10/26/2012	\$82.47	BARACK OBAMA	G2012
Marilyn Richardson	10/26/2012	\$43.20	BARACK OBAMA	G2012
Liliane Seraphin	10/26/2012	\$53.00	BARACK OBAMA	G2012
Shakera Bailey	10/26/2012	\$108.86	BARACK OBAMA	G2012
Marva Smith	10/26/2012	\$59.45	BARACK OBAMA	G2012
Mowatt Wendy	10/26/2012	\$14.01	BARACK OBAMA	G2012
Corey Willborn	10/26/2012	\$108.86	BARACK OBAMA	G2012
Tea Zubic	10/26/2012	\$105.84	BARACK OBAMA	G2012
Andre Broussard	11/2/2012	\$50.54	BARACK OBAMA	G2012
Anne Pierre	11/2/2012	\$80.19	BARACK OBAMA	G2012
Annie Rodriguez	11/2/2012	\$128.73	BARACK OBAMA	G2012
Beverly Armstrong	11/2/2012	\$66.75	BARACK OBAMA	G2012
Oscar Balladares	11/2/2012	\$128.73	BARACK OBAMA	G2012
Elena Barnabe	11/2/2012	\$47.86	BARACK OBAMA	G2012
Brandon Llewellyn	11/2/2012	\$40.61	BARACK OBAMA	G2012
Sumintra Carlisle	11/2/2012	\$78.53	BARACK OBAMA	G2012
Robert Constant	11/2/2012	\$78.93	BARACK OBAMA	G2012
Darlene Marshall	11/2/2012	\$82.77	BARACK OBAMA	G2012
Diane Duvercy	11/2/2012	\$221.53	BARACK OBAMA	G2012
Jose Enrique	11/2/2012	\$69.02	BARACK OBAMA	G2012
Marceline Fleurilus	11/2/2012	\$80.19	BARACK OBAMA	G2012
Chrisna Forero	11/2/2012	\$53.15	BARACK OBAMA	G2012
Keith Gage	11/2/2012	\$19.70	BARACK OBAMA	G2012
Gloria Clowney	11/2/2012	\$40.61	BARACK OBAMA	G2012
Judit Gual	11/2/2012	\$50.51	BARACK OBAMA	G2012
Tristan Guzman	11/2/2012	\$61.32	BARACK OBAMA	G2012
Maria Hays	11/2/2012	\$116.19	BARACK OBAMA	G2012
Jonathan Rodrigues	11/2/2012	\$83.91	BARACK OBAMA	G2012
Joseph Jay	11/2/2012	\$112.57	BARACK OBAMA	G2012
Dennis Junior	11/2/2012	\$81.34	BARACK OBAMA	G2012
Jorge Lopez	11/2/2012	\$118.59	BARACK OBAMA	G2012

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Marisol Marquez	11/2/2012	\$108.86	BARACK OBAMA	G2012
Brenda Narvaez	11/2/2012	\$26.55	BARACK OBAMA	G2012
Marie Novoa	11/2/2012	\$78.53	BARACK OBAMA	G2012
Ophelia Somers	11/2/2012	\$82.47	BARACK OBAMA	G2012
Marilyn Richardson	11/2/2012	\$80.34	BARACK OBAMA	G2012
Liliane Seraphin	11/2/2012	\$80.14	BARACK OBAMA	G2012
Shakera Bailey	11/2/2012	\$108.86	BARACK OBAMA	G2012
Marva Smith	11/2/2012	\$59.45	BARACK OBAMA	G2012
Mowatt Wendy	11/2/2012	\$74.91	BARACK OBAMA	G2012
Corey Willborn	11/2/2012	\$108.86	BARACK OBAMA	G2012
Tea Zubic	11/2/2012	\$105.84	BARACK OBAMA	G2012
Jonathan Rodrigues	10/19/2012	\$83.91	BILL NELSON	G2012
Andre Broussard	10/26/2012	\$50.54	BILL NELSON	G2012
Anne Pierre	10/26/2012	\$80.19	BILL NELSON	G2012
Annie Rodriguez	10/26/2012	\$128.73	BILL NELSON	G2012
Beverly Armstrong	10/26/2012	\$50.23	BILL NELSON	G2012
Oscar Balladares	10/26/2012	\$128.73	BILL NELSON	G2012
Elena Barnabe	10/26/2012	\$20.11	BILL NELSON	G2012
Brandon Llewellyn	10/26/2012	\$40.61	BILL NELSON	G2012
Sumintra Carlisle	10/26/2012	\$42.92	BILL NELSON	G2012
Robert Constant	10/26/2012	\$42.40	BILL NELSON	G2012
Darlene Marshall	10/26/2012	\$82.77	BILL NELSON	G2012
Diane Duvercy	10/26/2012	\$141.19	BILL NELSON	G2012
Marceline Fleurilus	10/26/2012	\$80.19	BILL NELSON	G2012
Chrisna Forero	10/26/2012	\$14.01	BILL NELSON	G2012
Gloria Clowney	10/26/2012	\$40.61	BILL NELSON	G2012
Judit Gual	10/26/2012	\$23.56	BILL NELSON	G2012
Tristan Guzman	10/26/2012	\$13.21	BILL NELSON	G2012
Maria Hays	10/26/2012	\$116.19	BILL NELSON	G2012
Jonathan Rodrigues	10/26/2012	\$83.91	BILL NELSON	G2012
Joseph Jay	10/26/2012	\$112.57	BILL NELSON	G2012
Dennis Junior	10/26/2012	\$58.38	BILL NELSON	G2012
Jorge Lopez	10/26/2012	\$118.59	BILL NELSON	G2012
Marisol Marquez	10/26/2012	\$108.86	BILL NELSON	G2012
Brenda Narvaez	10/26/2012	\$20.93	BILL NELSON	G2012
Marie Novoa	10/26/2012	\$77.55	BILL NELSON	G2012

Name of Payee	Date	Amount	Candidate	Election
Ophelia Somers	10/26/2012	\$82.47	BILL NELSON	G2012
Liliane Seraphin	10/26/2012	\$53.00	BILL NELSON	G2012
Shakera Bailey	10/26/2012	\$108.86	BILL NELSON	G2012
Marva Smith	10/26/2012	\$59.45	BILL NELSON	G2012
Mowatt Wendy	10/26/2012	\$14.01	BILL NELSON	G2012
Corey Willborn	10/26/2012	\$108.86	BILL NELSON	G2012
Tea Zubic	10/26/2012	\$105.84	BILL NELSON	G2012
Andre Broussard	11/2/2012	\$50.54	BILL NELSON	G2012
Anne Pierre	11/2/2012	\$80.19	BILL NELSON	G2012
Annie Rodriguez	11/2/2012	\$128.73	BILL NELSON	G2012
Beverly Armstrong	11/2/2012	\$66.75	BILL NELSON	G2012
Oscar Balladares	11/2/2012	\$128.73	BILL NELSON	G2012
Elena Barnabe	11/2/2012	\$47.86	BILL NELSON	G2012
Brandon Llewellyn	11/2/2012	\$40.61	BILL NELSON	G2012
Sumintra Carlisle	11/2/2012	\$78.53	BILL NELSON	G2012
Robert Constant	11/2/2012	\$78.93	BILL NELSON	G2012
Darlene Marshall	11/2/2012	\$82.77	BILL NELSON	G2012
Diane Duvercy	11/2/2012	\$221.53	BILL NELSON	G2012
Jose Enrique	11/2/2012	\$69.02	BILL NELSON	G2012
Marceline Fleurilus	11/2/2012	\$80.19	BILL NELSON	G2012
Chrisna Forero	11/2/2012	\$53.15	BILL NELSON	G2012
Keith Gage	11/2/2012	\$19.70	BILL NELSON	G2012
Gloria Clowney	11/2/2012	\$40.61	BILL NELSON	G2012
Judit Gual	11/2/2012	\$50.51	BILL NELSON	G2012
Tristan Guzman	11/2/2012	\$61.32	BILL NELSON	G2012
Maria Hays	11/2/2012	\$116.19	BILL NELSON	G2012
Jonathan Rodrigues	11/2/2012	\$83.91	BILL NELSON	G2012
Joseph Jay	11/2/2012	\$112.57	BILL NELSON	G2012
Dennis Junior	11/2/2012	\$81.34	BILL NELSON	G2012
Jorge Lopez	11/2/2012	\$118.59	BILL NELSON	G2012
Marisol Marquez	11/2/2012	\$108.86	BILL NELSON	G2012
Brenda Narvaez	11/2/2012	\$26.55	BILL NELSON	G2012
Marie Novoa	11/2/2012	\$78.53	BILL NELSON	G2012
Ophelia Somers	11/2/2012	\$82.47	BILL NELSON	G2012
Liliane Seraphin	11/2/2012	\$80.14	BILL NELSON	G2012
Shakera Bailey	11/2/2012	\$108.86	BILL NELSON	G2012
Marva Smith	11/2/2012	\$59.45	BILL NELSON	G2012

Name of Payee	Date	Amount	Candidate	Election		
Mowatt Wendy	11/2/2012	\$74.91	BILL NELSON	G2012		
Corey Willborn	11/2/2012	\$108.86	BILL NELSON	G2012		
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Maria Acevedo	10/19/2012	\$238.91	JOE GARCIA	G2012		
Lubby Arguello	10/19/2012	\$244.39	JOE GARCIA	G2012		
Oscar Balladares	10/19/2012	\$390.09	JOE GARCIA	G2012		
Marie Camy	10/19/2012	\$270.71	JOE GARCIA	G2012		
Lawrence Cuervo	10/19/2012	\$233.43	JOE GARCIA	G2012		
Keren Frederick	10/19/2012	\$255.82	JOE GARCIA	G2012		
Rochelle Jackson	10/19/2012	\$268.19	JOE GARCIA	G2012		
Johann Joseph	10/19/2012	\$272.78	JOE GARCIA	G2012		
Thamara LaCruz	10/19/2012	\$238.91	JOE GARCIA	G2012		
Gennary Merchan	10/19/2012	\$262.30	JOE GARCIA	G2012		
Marie Novoa	10/19/2012	\$249.87	JOE GARCIA	G2012		
Harold Pendas	10/19/2012	\$169.99	JOE GARCIA	G2012		
Rossana Torres	10/19/2012	\$255.35	JOE GARCIA	G2012		
Louikens Toussaint	10/19/2012	\$249.66	JOE GARCIA	G2012		
Maria Zavala	10/19/2012	\$244.39	JOE GARCIA	G2012		
Elena Barnabe	10/26/2012	\$20.11	JOE GARCIA	G2012		
Judit Gual	10/26/2012	\$23.56	JOE GARCIA	G2012		
Brenda Narvaez	10/26/2012	\$20.93	JOE GARCIA	G2012		
Alexis Cartland	10/19/2012	\$119.97	PATRICK MURPHY	G2012		
Brian Quillen	10/19/2012	\$119.22	PATRICK MURPHY	G2012		
Dionne Allen	10/19/2012	\$91.99	PATRICK MURPHY	G2012		
Frankisha Walker	10/19/2012	\$113.50	PATRICK MURPHY	G2012		
John Tracey	10/19/2012	\$136.37	PATRICK MURPHY	G2012		
Kathy Dent	10/19/2012	\$130.03	PATRICK MURPHY	G2012		
Kerline Cambronne	10/19/2012	\$116.25	PATRICK MURPHY	G2012		
Louis Porteous	10/19/2012	\$107.08	PATRICK MURPHY	G2012		
Robert Richardson	10/19/2012	\$101.42	PATRICK MURPHY	G2012		
Sandy Hector	10/19/2012	\$138.87	PATRICK MURPHY	G2012		
Sarah Halper	10/19/2012	\$115.23	PATRICK MURPHY	G2012		
Tony Patterson	10/19/2012	\$106.30	PATRICK MURPHY	G2012		
Yettie Thompkins	10/19/2012	\$126.16	PATRICK MURPHY	G2012		
Anne Pierre	10/19/2012	\$160.37	PATRICK MURPHY	G2012		
Marceline Fleurilus	10/19/2012	\$160.37	PATRICK MURPHY	G2012		

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Name of Payee	Date	Amount	Candidate	Election
Ophelia Somers	10/19/2012	\$164.94	PATRICK MURPHY	G2012
Andre Broussard	10/26/2012	\$50.54	VALDEZ VAL DEMINGS	G2012
Brandon Llewellyn	10/26/2012	\$40.61	VALDEZ VAL DEMINGS	G2012
Gloria Clowney	10/26/2012	\$40.61	VALDEZ VAL DEMINGS	G2012

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#### Late 24 Hour Report (Schedule E) Florida Freedom PAC (C00521013)

Name of Payee	Date	Amount	Candidate	Election	Report Received
SEIU-CC, LLC	11/4/2012	\$3,474.00	BARACK OBAMA	G2012	11/12/12
The Pivot Group, Inc.	10/22/2012	\$11,652.00	BARACK OBAMA	G2012	12/6/12
Atlantic Litho	10/29/2012	\$2,560.00	BARACK OBAMA	G2012	12/6/12
Atlantic Litho	10/29/2012	\$4,396.40	BARACK OBAMA	G2012	12/6/12
The Pivot Group, Inc.	10/22/2012	\$7,768.00	BILL NELSON	G2012	12/6/12
The Pivot Group, Inc.	10/22/2012	\$9,710.00	JOE GARCIA	G2012	12/6/12
			VALDEZ VAL		
The Pivot Group, Inc.	10/22/2012	\$9,710.00	DEMINGS	G2012	12/6/12